



December 13, 2024

VIA ECF

The Honorable Jessica G.L. Clarke  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Rapaport v. Epstein, et al.*, No. 1:24-cv-07439 (JGLC)  
Motion for Extension of Time to Answer

Dear Judge Clarke:

I write on behalf of Ajay Iyer to respectfully request that his deadline to respond to Plaintiff's complaint be extended to January 30, 2025. This is Mr. Iyer's first request for an extension of this deadline, and there is good cause to grant this request.

According to Plaintiff's recently filed Affidavit of Service (ECF No. 6), Plaintiff purports to have served Mr. Iyer on November 25, 2024. Putting aside for now whether Plaintiff's service was proper, Mr. Iyer's response deadline is currently set on the docket for December 16, 2024. Undersigned counsel was only retained earlier today to represent Mr. Iyer in this matter, and thus more time is needed to review the complaint and confer with Mr. Iyer about how he wishes to respond. Further, undersigned counsel will be away on long-planned travel over the upcoming holidays, which will also delay his ability to confer with Mr. Iyer about how he wishes to respond to the complaint. Additionally, undersigned counsel must balance the deadlines here with several other pressing deadlines over the next month.

For these reasons and to ensure that Mr. Iyer has sufficient time to prepare a thorough response to the complaint, I respectfully request that the Court extend Mr. Iyer's response deadline to January 30, 2025, which will also align his response deadline with the deadline currently in place for Defendant Pallaki (ECF No. 12).

In advance of filing this motion, I contacted Plaintiff for his position. Plaintiff stated that he would only consent to this extension request if undersigned counsel signed a stipulation stating that Defendant Iyer consents to any future extension request of up to 44 days that Plaintiff seeks. As undersigned explained to Plaintiff, he considers consenting to extension requests to be a matter of common courtesy, but he is unable to sign a stipulation agreeing to hypothetical future extension requests. Because the undersigned was unable to sign the stipulation, Plaintiff opposes this request.

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Respectfully,

/s/ Brian J. Field

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*\*Pro hac vice* motion concurrently  
filed and pending

*Counsel for Defendant Ajay Iyer*

cc: *Pro se* Plaintiff and all counsel (via ECF)